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Attorneys for Plaintiff  
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 JOSE DE JESUS ORTEGA and  
DANIELLE NADINE DAVILA,  
17

18 Defendants.

No. 5:25-mj-500-DUTY

UNOPPOSED MOTION TO DISMISS  
COMPLAINT WITHOUT PREJUDICE

19 Plaintiff United States of America, by and through its counsel  
20 of record, the Acting United States Attorney for the Central District  
21 of California and Assistant United States Attorney Cory L. Burleson,  
22 pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure,  
23 hereby moves to dismiss the Complaint in the above-captioned case,  
24 which charges defendants with forcibly assaulting, impeding, and  
25 interfering with a federal officer involving physical contact, in  
26 violation of 18 U.S.C. § 111(a)(1). On August 14, 2025, the  
27 Honorable David T. Bristow, United States Magistrate Judge, dismissed  
28 the second count of the complaint on motion by the United States.

1 The United States requests that this dismissal of the Complaint  
2 be without prejudice. Counsel for the United States contacted  
3 defendants' counsel via phone about this motion, and defendants'  
4 counsel advised that defendants do not oppose this motion.

5 Dated: August 15, 2025

Respectfully submitted,

6 BILAL A. ESSAYLI  
Acting United States Attorney

7 CHRISTINA T. SHAY  
8 Assistant United States Attorney  
Chief, Criminal Division

9 PETER DAHLQUIST  
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14 Assistant United States Attorney

15 Attorneys for Plaintiff  
UNITED STATES OF AMERICA  
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